



Environmental Protection Department
Permits & Regulatory Affairs Division

LLNL-TR-420512

**LLNL's Response to 9/9/2009 Annual
Inspection Report Comments
B113 Issue #1 and B271 Issue #2**

December 1, 2009

William Schwartz



December 1, 2009

Mr. Robert Weston
Senior Hazardous Materials Specialist
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

Subject: *Lawrence Livermore National Laboratory (LLNL's) Response to 9/9/2009 Annual Inspection Report Comment – B113 Issue #1 and B271 Issue #2*

Dear Mr. Weston:

Enclosed please find LLNL's responses to your comments in the 9/9/2009 Annual Inspection Report concerning Underground Storage Tank (UST) 113-D1U2 (Issue #1) at Building 113 and UST 271-D2U1 (Issue #2) at Building 271. Also enclosed is the required Application for Underground Storage Tank Modification for USTs 113-D1U2 and 271-D2U1 and the specification sheet for the Phil-Tite spill bucket that is proposed to be installed in the 271-D2U1 sump.

If you have any questions or need additional information, please contact Bill Schwartz of the Permits and Regulatory Affairs Division at (925) 423-6626.

Sincerely,

Sav Mancieri, Division Leader
Permits and Regulatory Affairs Division
Environmental Protection Department

- Enclosures:
1. 9/9/2009 Annual Inspection-Response to CUPA B113 Issue #1 & B271 Issue #2 - Spill Buckets
 2. Application for Underground Storage Tank Modification
 3. Phil-Tite Replacement Spill Containers

Copy w/enclosures:
Wuthrich, Steve L-510

PRAD09:217 – SM:WWS:ilh



Enclosure 1

**9/9/2009 Annual Inspection – Response to
CUPA B113 Issue #1 & B271 Issue #2 – Spill Buckets**

**9/9/2009 Annual Inspection – Response to CUPA
113-D1U2 Issue #1**

Response to Inspection Comment by Alameda County CUPA for 9/9/2009 Annual Underground Storage Tank (UST) inspection of the 113-D1U2 UST.

113-D1U2

Issue #1: Spill bucket failed to hold test fluid used during testing. Submit a plan to correct integrity of the spill bucket.

Response to Issue #1

LLNL has prepared a UST Modification plan for the 113-D1U2 tank system to repair the spill bucket. The enclosed UST Modification application includes the scope for the repair of the spill bucket. After the repair is completed, the spill bucket will be leak tested and the leak test report will be sent to you.

**9/9/2009 Annual Inspection – Response to CUPA
271-D2U1 Issue #2**

Response to Inspection Comment by Alameda County CUPA for 9/9/2009 Annual Underground Storage Tank (UST) inspection of the 271-D2U1 UST.

271-D2U1

Issue #2: Provide specifications for the installation of a spill bucket of 5 gallon capacity on the fill riser within the pipe sump.

Response to Issue #2

LLNL has prepared a UST Modification plan for the 271-D2U1 tank system to install a new 5 gallon spill bucket in the pipe sump. The enclosed UST Modification application includes the scope of the installation and the specification of the spill bucket that is proposed to be installed. After installation, the spill bucket will be leak tested and the leak test report will be sent to you.

Enclosure 2

Application for Underground Storage Tank Modification

Alameda County

Department of Environmental Health

Application for Underground Storage Tank Modification

The Application For The Modification Of Underground Storage Tanks Is Only Valid For 6 Months From The Date Of Approval.

Project Contact and Telephone Number William Schwartz (925) 423-6626			
Facility Name Lawrence Livermore National Laboratory (Building 112/113 and Building 271)			Telephone Number (925) 423-6626
Address P. O. Box 808 L-627; Livermore, CA 94551 7000 East Avenue, L-627; Livermore, CA 94551			
Cross Street Vasco Road			
Underground storage tank - Owner / Operator Paul Swyers			Telephone Number (925) 422-9061
Contractor's Name Thornton Environmental Construction, Inc.			Telephone Number (209) 834-0792 c(209) 321-0882
Contractor Address P. O. Box 360833, Milpitas, CA 95036-0833			CA License # 724513
			Class A, C10
Hazardous Substance Certificate: Yes <u>X</u> No ____ (Qualifying license category NA)			Workers Comp. # Exempt
Fire Department LLNL Fire Department			Permit Number Not Applicable
Does this site have a leaking UST (or did it have a leaking tank system?) Yes ____ No <u>X</u>			
State Tank ID Number	Tank Size	Material To Be Stored	Installation Date
016652-000104 113-D1U2	350 gallons	Diesel	1994
016652-000099 271-D2U1	1000 gallons	Diesel	1986

The Applicant shall complete this checklist as applicable for the scope of work proposed. It will serve as a reminder for the applicant of the items under review for the modification of an Underground Storage Tank.

UST SYSTEM INFORMATION (Drawing and submissions must include Number 1 through Number 9)

1. ✓ Three complete sets of plans (include manufacturer's specification sheets for proposed equipment to be installed.) **Will be provided by contractor noted on Page 1.**
2. NA Plans drawn to scale in non-erasable print. Scale is to be at least 1/4 inch to the foot.
3. NA Plot plan to show location of tanks and all associated piping.
4. NA Detail of tank, associated piping, leak detection equipment, excavation, and cover.
5. NA Tank(s) and piping approved by a nationally recognized independent testing organization. [Title 23, Chapter 10, Article 3, Section 2631 (b), and Section 2635]
6. ✓ Verification of product compatibility with the tank(s), piping, monitoring device(s), epoxy or silicone glues, etc.
7. ✓ Manufacturer's written installation instructions for tank(s), piping, monitoring devices, etc. **Will be provided by contractor noted on Page 1.**
8. ✓ Total number of tanks on site after installation: 1 at B112/113 & 1 at B271
9. ✓ Submit a Site Safety plan. (contractor) **Will be provided by contractor noted on Page 1.**
10. Exempt Contractor must submit a copy of **Workers Compensation Certificate.**
11. NA County/City **Building Department** notified.
12. NA County/City **Fire District** notified.
13. ✓ **In the event contamination is observed, confirmed or suspected as a result of the tank system, it is your responsibility as an owner or operator to comply with Title 23, California Code of Regulations, Chapter 16, Article 5 (Release Reporting and Initial Abatement Requirements and Article 11 (Corrective Action Requirements).**

The owner or operator must acknowledge this responsibility for work plan submittal by signature and date below:

Name Paul Swyers Paul W. Swyers
 Title Division Leader, Electrical Maintenance Division Date 11-9-09

Upon review of the modification application, application checklist, and accompanying documentation, conditions of approval will be attached to the project.

CONDITIONS OF APPROVAL:

SCOPE OF WORK**Building 112/113 UST 113-D1U2****Repair Existing Spill Bucket**

Disassemble and repair existing Emco Wheaton spill bucket, including cleaning the o-ring, outer pan, and inner skirt. Remove existing drain valve, and supply and install new drain valve. Reassemble and reinstall spill bucket. After repair of spill bucket, perform hydrostatic lake test or equivalent of repaired spill bucket to verify leak tightness. Provide spill bucket leak test report.

No excavation or trenching will be required.

Building 271 UST 271-D2U1**Install New Spill Bucket**

Remove and dispose of existing fill adaptor and existing cap. Supply and install new Phil-Tite 5 gallon spill bucket with drain valve and factory installed internal riser (Part # 85100-1). Modify existing riser as needed or supply and install new riser if required. Remove and modify existing drop tube as needed and reinstall. Supply and install new fill adaptor and new cap. Modify/extend existing reducer collar as needed to clear new spill bucket when existing reducer collar cover is in place. After installation of new spill bucket, perform hydrostatic lake test or equivalent of new spill bucket to verify leak tightness. Provide spill bucket leak test report.

No excavation or trenching will be required.

Enclosure 3

Phil-Tite Replacement Spill Containers

Phil-Tite Replacement Spill Containers

PHIL-TITE

Replacement 5 gallon spill containers, include factory installed risers on both fill and vapor models. A drain valve is included on fill models as shown. Factory assembled and tested. For all direct bury and multi-port manholes. Not for use as platform replacements. See 85000-EXT below for platform containers.

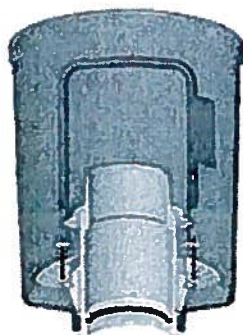
Design Highlights & Advantages

- Provides for 5 gallon capacity.
- Extra space at top of spill container makes it easier for drivers to connect fuel hose.

Certifications/Listings

- * EVR Phase 1 Certification VR-101
- * ULC file # MH21091
- * Florida approved EQ555
- * Tracer Tight approved

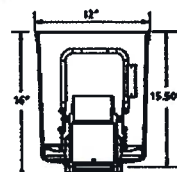
PATENT #: 4,696,330



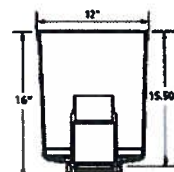
85100-1 FILL



85101-1 VAPOR



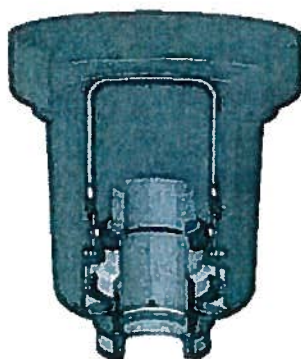
85100-1 FILL



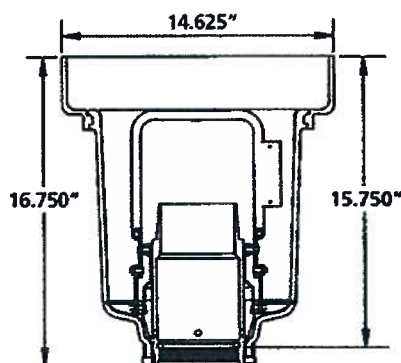
85101-1 VAPOR

PART	DESCRIPTION
85100-1	Replacement 5 gallon 85000-1 series fill spill bucket with drain valve
85101-1	Replacement 5 gallon 85000-1 series vapor spill bucket, without drain valve

The 85100-EXT 5 gallon spill containers are the same as the 85100 models, except these include an extension for use with watertight and non-watertight platform packages shown on page 58. Available as a vapor (without drain valve) or fill, with drain valve.



85100-EXT



85100-EXT

PART	DESCRIPTION
85100-EXT	Fill spill collector with 5 gallon extension attached, with drain valve
85101-EXT	Vapor spill collector with 5 gallon extension attached, without drain valve



Environmental Protection Department, Lawrence Livermore National Laboratory
P.O. Box 808, L-627, Livermore, California 94551